

REC'D JUL 31 2024

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

Sakinah Wade,
Plaintiff,

v.

Case No.:

State of Pennsylvania,
Philadelphia Commissioner of Records,
Ella Burns & John Howell,
Judge Michael Erdos, in his private capacity,
Attorney Jay E. Kivitz, in his private capacity,
Attorney David Denenberg, in his private capacity,
Defendants.

CIVIL COMPLAINT FOR CONSPIRACY TO COMMIT REAL ESTATE DEED FRAUD, VIOLATION OF 18 U.S.C. §§ 241, 242, AND THE IRS CODE

COMES NOW, Sakinah Wade, files this civil lawsuit for violation of Rights pursuant to 18 U.S.C. §§ 241, 242, conspiracy to commit real estate deed fraud, deprivation of rights under color of law, and violation of the IRS code.

1. Jurisdiction and Venue

Jurisdiction:

This court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. § 1331, which provides district courts with jurisdiction over civil actions arising under the United States Constitution or laws of the United States.

This court has personal jurisdiction over the defendants because their principal place of business is in this state.

Venue:

Venue is proper pursuant to 28 U.S.C. § 1391(b) because the events giving rise to the allegations in this complaint occurred in this district.

2. Federal Basis for the Claims

This complaint is based on federal statutes and constitutional provisions, establishing a clear federal question under 28 U.S.C. § 1331:

1. **18 U.S.C. § 241 (Conspiracy Against Rights):** This statute makes it a federal crime for two or more persons to conspire to injure, oppress, threaten, or intimidate any person in the free exercise or enjoyment of any right or privilege secured to them by the Constitution or laws of the United States. The plaintiff alleges that the defendants conspired to violate her constitutional rights through unlawful property deed registration and fraudulent taxation practices.
2. **18 U.S.C. § 242 (Deprivation of Rights Under Color of Law):** This statute makes it a federal crime for any person acting under color of law to willfully deprive any person of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States. The plaintiff alleges that the defendants, acting under color of state law, deprived her of her property rights without due process.
3. **Violation of the IRS Code:** The plaintiff alleges that the defendants engaged in a scheme to evade taxes, violating federal tax laws and constituting a RICO scheme, which falls under the jurisdiction of federal courts.
4. **Constitutional Violations:** The complaint includes allegations of violations of constitutional provisions, including improper reclassification of property for taxation purposes and deprivation of property without due process, which are actionable under 42 U.S.C. § 1983.

3. Factual Allegations

1. Unlawful Property Deed Registration:

- On or about April 8, 2003, city employees registered the plaintiff's property at 203 Simpson Street without disclosing that no law mandates such registration.
- The plaintiff was not provided full disclosure about the implications of registering her property.
- The registration allowed defendants to file illegal liens and extort property taxes from the plaintiff.

2. Deprivation of Constitutional Rights:

- The state law requires delivery of the property deed to the new owner; however, defendants violated this law by registering the deed without proper notification and consent.
- The illegal registration resulted in the reclassification of the plaintiff's private property for taxation purposes, against constitutional guidelines.

3. Fraudulent Taxation Practices:

- The property tax system applied to the plaintiff's property does not comply with constitutional guidelines, specifically Articles I, Sections 2 and 9, and Article I, Section 8, Clause 1.
- Plaintiff's property was wrongfully reclassified without permission to commercial categories for the purpose of taxation.

4. IRS Code Violations and RICO Scheme:

- Defendants engaged in a scheme involving the plaintiff's property deed to evade taxes and did not file required asset statements under IRS section 338, thereby committing fraudulent securities transactions.

5. Infliction of Emotional Distress:

- Defendants' actions, including the wrongful classification and continuous unlawful taxation threats, have caused severe emotional distress to the plaintiff, impacting her mental health and quality of life.

4. Specific Claims for Relief

Count One: Violation of 18 U.S.C. §§ 241, 242 (Conspiracy and Deprivation of Rights)

- Plaintiff incorporates by reference the facts alleged in paragraphs 1-5.
- The defendant's actions directly resulted in the deprivation of the plaintiff's rights under color of law.

Count Two: Conspiracy to Commit Real Estate Deed Fraud

- Plaintiff incorporates by reference the facts alleged in paragraphs 1-5.
- Defendants conspired to commit real estate deed fraud by unlawfully registering the plaintiff's property deed.

Count Three: Violation of the IRS Code

- Plaintiff incorporates by reference the facts alleged in paragraphs 1-5.
- Defendants engaged in fraudulent activities related to the IRS code, resulting in illegal taxation and financial harm to the plaintiff.

Count Four: Infliction of Emotional Distress

- Plaintiff incorporates by reference the facts alleged in paragraphs 1-5.
- Defendants' actions have caused severe emotional distress, warranting compensatory and punitive damages.

Count Five: Slander of Title and Credit

- Plaintiff incorporates by reference the facts alleged in paragraphs 1-5.
- Defendants have recorded false documents, impairing the plaintiff's title and credit, entitling her to damages.

Count Six: Equitable Relief for Removal of Property Deed from Records

- Plaintiff incorporates by reference the facts alleged in paragraphs 1-5.
- Defendants unlawfully registered the plaintiff's property deed without proper disclosure or authorization.
- Plaintiff requests equitable relief to have the property deed removed from the City of Philadelphia Department of Records Office.

5. Request for Relief

WHEREFORE, Plaintiff Sakinah Wade requests the following:


1. **Compensatory and consequential damages**, including for emotional distress, humiliation, and other pain and suffering, in the amount of \$3 million.
2. **Punitive damages** against the defendants, jointly and severally, in an amount to be determined at trial.
3. **Prejudgment and post-judgment interest** on all sums awarded in this action, including reasonable legal fees pursuant to 42 U.S.C. § 1988.
4. **Equitable relief** to have the plaintiff's property deed removed from the City of Philadelphia Department of Records.
5. **Other equitable relief** that the court deems appropriate.

6. Demand for Jury Trial

Plaintiff hereby demands a jury trial on all issues so triable.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 31st day of July, 2024.

By: 

Sakinah Wade
203 Simpson Street
Philadelphia, Pennsylvania 19139

NOTICE

CERTIFICATE OF SERVICE

I, Sakinah Wade, deposited or caused to be deposited in the U.S. Mail a true and correct copy of the foregoing to all parties of past interest below:

- **City of Philadelphia**
Attn: James P. Leonard
Philadelphia Commissioner of Records
1400 John F. Kennedy Blvd, Room 111, Philadelphia, PA 19107
- **Judge Michael Erdos**
1301 Filbert Street, CJC, Philadelphia, PA 19107
- **State of Pennsylvania**
Office of Governor
508 Main Capitol Building, Harrisburg, PA 17120
- **Attorney David H. Denenberg**
1315 Walnut Street, Ste 500, Philadelphia, PA [19107]
- **Ella Burns and John Howell**
205 N. Simpson Street, Philadelphia, PA 19139
- **Attorney Jay E. Kivitz**
7901 Ogontz Avenue, Philadelphia, PA 19150

Date: July 31, 2024

By: /s/ Sakinah Wade

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